

**ENTERED**

July 09, 2025

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	CASE NO. 25-30155
	§	
ALLIANCE FARM AND RANCH, LLC,	§	(CHAPTER 11)
	§	
DEBTOR	§	
	§	
IN RE:	§	CASE NO. 25-31937
	§	
ALLIANCE ENERGY PARTNERS, LLC,	§	(CHAPTER 11)
	§	
DEBTOR	§	
	§	

**SECOND STIPULATION AND AGREED ORDER  
EXTENDING THE OBJECTION DEADLINE REGARDING  
APPLICATION FOR APPROVAL OF EMPLOYMENT OF OKIN ADAMS  
BARTLETT CURRY, LLP AS COUNSEL FOR DEBTORS AND  
APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF  
EXPENSES FOR THE PERIODS MARCH 14, 2025 THROUGH MAY 23, 2025  
(ALLIANCE FARM AND RANCH, LLC) AND APRIL 7, 2025 THROUGH  
MAY 23, 2025 (ALLIANCE ENERGY PARTNERS, LLC)  
[Related to Doc No. 130]**

This Second Stipulation ("Stipulation") is entered into by (a) Tom A. Howley in his capacity as the chapter 11 trustee (the "Trustee") in the above-numbered and styled bankruptcy proceedings; and (b) Okin Adams Bartlett Curry, LLP ("Okin Adams") (together the "Parties"). The Parties hereby stipulate and agree as follows:

WHEREAS, the Trustee was appointed on May 27, 2025 at Docket No. 115.

WHEREAS, on June 4, 2025 Okin Adams filed its *Application for Approval of Employment of Okin Adams Bartlett Curry, LLP as Counsel for Debtors and Application for Compensation and Reimbursement of Expenses for the Periods March 14, 2025 Through May 23, 2025 (Alliance Farm and Ranch, LLC) and April 7, 2025 Through May 23, 2025 (Alliance Energy Partners, LLC)* (the "Application").

WHEREAS, the deadline to object to the Application was June 25, 2025 (“Objection Deadline”).

WHEREAS, the Parties have been engaging in discussions relating to a possible resolution of any objections to the Application. The Court entered the first Stipulation and Agreed Order extending the deadline to July 9, 2025, at Docket No. 140. The Parties have agreed to further extend the Objection Deadline for the Parties to this Stipulation.


WHEREAS, the Parties have agreed that the Objection Deadline should be extended to July 16, 2025 (“Extended Objection Deadline”) for the Parties to this Stipulation.

**NOW, THEREFORE**, the Parties hereby stipulate and agree and it is **ORDERED** that:

1. The foregoing recitals are hereby incorporated by reference into this Stipulation with the same force and effect as if fully set forth hereinafter.
2. Unless otherwise agreed to by the parties by separate stipulation, the Extended Objection Deadline of July 16, 2025 shall be the objection deadline for the Parties to this Stipulation regarding Okin Adam’s Application.
3. The provisions of this Stipulation shall be binding on the Parties and their successors, heirs, and assigns and shall inure to the benefit of the Parties and their successors and assigns.
4. Each person who executes this Stipulation on behalf of a Party hereto represents that he or she is duly authorized to execute this Stipulation and agrees to the terms set forth herein.
5. This Stipulation shall be effective and enforceable immediately upon entry of this Stipulation, in accordance with its terms.

6. The Bankruptcy Court retains jurisdiction with respect to the implementation of this Stipulation, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies with respect to this Stipulation.

Signed: July 09, 2025

  
Alfredo R Pérez  
United States Bankruptcy Judge

Dated: July 8, 2025

/s/ Eric Terry

**Eric Terry**

Texas Bar No. 00794729

**HOWLEY LAW PLLC**

TC Energy Center

700 Louisiana St., Suite 4545

Houston, Texas 77002

Telephone: 713-333-9125

Email: [eric@howley-law.com](mailto:eric@howley-law.com)

**Proposed Counsel for Tom A. Howley –  
Trustee**

- and -

**OKIN ADAMS BARTLETT CURRY  
LLP**

/s/ Timothy L. Wentworth

Timothy L. Wentworth

Texas Bar No. 21179000

Email: [twentworth@okinadams.com](mailto:twentworth@okinadams.com)

1113 Vine Street, Suite 240

Houston, Texas 77002

Telephone: 713.228.4100

Facsimile: 346.247.7158

**Proposed Attorneys for the Debtor**

**CERTIFICATE OF SERVICE**

I certify that on June 8, 2025, I caused a copy of the foregoing document to be served by electronic transmission to all registered ECF users appearing in these cases.

/s/ Eric Terry

Eric Terry

United States Bankruptcy Court  
Southern District of Texas

In re:  
ALLIANCE FARM AND RANCH, LLC  
Alliance Energy Partners, LLC  
Debtors

Case No. 25-30155-arp  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0541-4  
Date Rcvd: Jul 09, 2025

User: ADIuser  
Form ID: pdf002

Page 1 of 3  
Total Noticed: 6

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 11, 2025:**

Recip ID	Recipient Name and Address
db	+ ALLIANCE FARM AND RANCH, LLC, 5450 Honea Egypt Rd, Montgomery, TX 77316-2364
jdb	+ Alliance Energy Partners, LLC, 20008 Champions Forest Dr., Suite 1203, Spring, TX 77379-8697
aty	+ Eric Terry, Howley Law PLLC, 700 Louisiana Street, Ste 4545, Houston, TX 77002, UNITED STATES 77002-2869
cr	+ Jerod P Furr, 259 Saddle Ridge, Spring, TX 77380-2748
cr	+ Patriot Drilling Services LLC, c/o William R. Sudela, Crady Jewett McCulley & Houren LLP, 2727 Allen Parkway, Suite 1700, Houston, TX 77019-2125

TOTAL: 5

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	Email/Text: lloyd.lim@keanmiller.com	Jul 09 2025 20:05:00	DrilTech, LLC, C/O Rachel Kubanda, 711 Louisiana Street, Suite 1800, Houston, TX 77002

TOTAL: 1

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
aty		Okin Adams Bartlett Curry LLP
cr		Dustin Etter
intp		Erik and Darla Ostrander
cr		KLEIN INDEPENDENT SCHOOL DISTRICT
crcom		Official Committee of Unsecured Creditors

TOTAL: 5 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

**I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jul 11, 2025

Signature: /s/Gustava Winters

District/off: 0541-4  
Date Rcvd: Jul 09, 2025

User: ADIuser  
Form ID: pdf002

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Total Noticed: 6

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 9, 2025 at the address(es) listed below:

Name	Email Address
Abdiel Lopez-Castro	on behalf of Creditor Dustin Etter alopezcastro@hwa.com
Branch Masterson Sheppard	on behalf of Defendant Jeana Lea Hurley bsheppard@mcglinchey.com sdeleon@gallowaylawfirm.com
Branch Masterson Sheppard	on behalf of Defendant Connect Realty.com Inc. bsheppard@mcglinchey.com, sdeleon@gallowaylawfirm.com
Branch Masterson Sheppard	on behalf of Defendant Heaven Lee Properties LLC bsheppard@mcglinchey.com, sdeleon@gallowaylawfirm.com
Deborah Louise Crain	on behalf of Defendant Alliance Energy Partners LLC dcrain@e-merger.law
Deborah Louise Crain	on behalf of Defendant AE Partners Holdings Inc. dcrain@e-merger.law
Deborah Louise Crain	on behalf of Defendant ALLIANCE FARM AND RANCH LLC dcrain@e-merger.law
Deborah Louise Crain	on behalf of Defendant AEP Asset Holdings LLC dcrain@e-merger.law
Deborah Louise Crain	on behalf of Defendant Jerod P Furr dcrain@e-merger.law
Deborah Louise Crain	on behalf of Debtor ALLIANCE FARM AND RANCH LLC dcrain@e-merger.law
Deborah Louise Crain	on behalf of Defendant Invictus Drilling Motors LLC dcrain@e-merger.law
Deborah Louise Crain	on behalf of Defendant Corina Furr dcrain@e-merger.law
Eric Brad Terry	on behalf of Trustee Tom Howley eric@howley-law.com
Ha Minh Nguyen	on behalf of U.S. Trustee US Trustee ha.nguyen@usdoj.gov
Heather Heath McIntyre	on behalf of Creditor Dustin Etter HMcIntyre@hwallp.com dek@hwallp.com;lslater@hwa.com
James Randal Bays	on behalf of Defendant AE Partners Holdings Inc. randy@baysfirm.com, Kerry@baysfirm.com;randybays@hotmail.com;Vickie@baysfirm.com
James Randal Bays	on behalf of Defendant Alliance Energy Partners LLC randy@baysfirm.com, Kerry@baysfirm.com;randybays@hotmail.com;Vickie@baysfirm.com
James Randal Bays	on behalf of Defendant ALLIANCE FARM AND RANCH LLC randy@baysfirm.com, Kerry@baysfirm.com;randybays@hotmail.com;Vickie@baysfirm.com
James Randal Bays	on behalf of Defendant AEP Asset Holdings LLC randy@baysfirm.com, Kerry@baysfirm.com;randybays@hotmail.com;Vickie@baysfirm.com
James Randal Bays	on behalf of Defendant Jerod P Furr randy@baysfirm.com Kerry@baysfirm.com;randybays@hotmail.com;Vickie@baysfirm.com
James Randal Bays	on behalf of Defendant Invictus Drilling Motors LLC randy@baysfirm.com, Kerry@baysfirm.com;randybays@hotmail.com;Vickie@baysfirm.com
James Randal Bays	on behalf of Defendant Corina Furr randy@baysfirm.com Kerry@baysfirm.com;randybays@hotmail.com;Vickie@baysfirm.com
Justin William Randall Renshaw	on behalf of Creditor IAE International Inc justin@renshaw-law.com, kim@renshaw-law.com
Leonard H Simon	

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Total Noticed: 6

	on behalf of Creditor Jerod P Furr Isimon@pendergraffsimon.com csanchez@pendergraffsimon.com;jdavila@pendergraffsimon.com;rlp@pendergraffsimon.com
Leonard H Simon	on behalf of Defendant Jerod P Furr Isimon@pendergraffsimon.com csanchez@pendergraffsimon.com;jdavila@pendergraffsimon.com;rlp@pendergraffsimon.com
Melissa E Valdez	on behalf of Creditor KLEIN INDEPENDENT SCHOOL DISTRICT mvaldez@pbfc.com mvaldez@ecf.courtdrive.com;arandermann@pbfc.com
Nicholas Zugaro	on behalf of Creditor Committee Official Committee of Unsecured Creditors Nzugaro@dykema.com DocketHOU@dykema.com;ccastic@dykema.com
Noah E Meek	on behalf of Plaintiff Dustin Etter nmeek@irelanlaw.com nperez@irelanlaw.com;scartwright@irelanlaw.com
Noah E Meek	on behalf of Interested Party Dustin Etter nmeek@irelanlaw.com nperez@irelanlaw.com;scartwright@irelanlaw.com
Noah E Meek	on behalf of Creditor Dustin Etter nmeek@irelanlaw.com nperez@irelanlaw.com;scartwright@irelanlaw.com
Rachel Kubanda	on behalf of Creditor DrilTech LLC rachel.kubanda@keanmiller.com, michelle.friery@keanmiller.com;kristina.tipton@keanmiller.com;teresa.miller@keanmiller.com
Reagan H. Tres Gibbs, III	on behalf of Interested Party Erik and Darla Ostrander tgibbs@cokinoslaw.com jjohnson@cokinoslaw.com
Samuel Thomas Pendergast	on behalf of Interested Party Erik and Darla Ostrander spendergast@cokinoslaw.com jgraffagnino@cokinoslaw.com
Sara Aniece Morton	on behalf of Defendant Jeana Lea Hurley smorton@rmjelaw.com
Sara Aniece Morton	on behalf of Defendant Connect Realty.com Inc. smorton@rmjelaw.com
Sara Aniece Morton	on behalf of Defendant Heaven Lee Properties LLC smorton@rmjelaw.com
Thomas A Howley	on behalf of Trustee Thomas A Howley tom@howley-law.com thowley@ecf.axosfs.com
Thomas A Howley	on behalf of Attorney Eric Terry tom@howley-law.com thowley@ecf.axosfs.com
Thomas A Howley	on behalf of Trustee Tom Howley tom@howley-law.com roland@howley-law.com;eric@howley-law.com
Thomas A Howley	tom@howley-law.com thowley@ecf.axosfs.com
Timothy L. Wentworth	on behalf of Joint Debtor Alliance Energy Partners LLC twentworth@okinadams.com, sgonzales@okinadams.com;nholon@okinadams.com
Timothy L. Wentworth	on behalf of Attorney Okin Adams Bartlett Curry LLP twentworth@okinadams.com sgonzales@okinadams.com;nholon@okinadams.com
Timothy L. Wentworth	on behalf of Debtor ALLIANCE FARM AND RANCH LLC twentworth@okinadams.com, sgonzales@okinadams.com;nholon@okinadams.com
Timothy L. Wentworth	on behalf of Debtor Alliance Energy Partners LLC twentworth@okinadams.com, sgonzales@okinadams.com;nholon@okinadams.com
US Trustee	USTPRegion07.HU.ECF@USDOJ.GOV
William James Hotze	on behalf of Creditor Committee Official Committee of Unsecured Creditors whotze@dykema.com
William R Sudela	on behalf of Creditor Patriot Drilling Services LLC wsudela@cjmhlaw.com

TOTAL: 47